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MARGARET MARTINEZ

8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

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11 MARGARET MARTINEZ, individually
and on behalf of all others similarly
12 situated,

13 Plaintiff,

14 vs.

15 HOPE CREDIT, LLC,

16 Defendant.

Case No.: 2:23-cv-01003-BNW

**JOINT STIPULATION AND
ORDER EXTENDING
DISCOVERY DEADLINES**

(FIRST REQUEST)

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1 Plaintiff MARGARET MARTINEZ (“Plaintiff”), and Defendant HOPE
2 CREDIT, LLC (“Defendant”) (the “Parties”) hereby jointly move to extend all
3 deadlines set forth in the Joint Proposed Discovery Plan and Scheduling Order filed
4 with this Court on September 7, 2023, (ECF No. 11) by a period of ninety (90) days.

5 The Parties have exchanged initial disclosures and believe that this matter will
6 need more time to flush out the discovery issues and facts. The Parties anticipate
7 review of additional documents and recordings as well as depositions from multiple
8 third-party witnesses. Due to the nature of the facts here, the Parties in good faith
9 believe more time is necessary to conduct efficient discovery and for the Parties to
10 have effective conversations.

11 1. On June 29, 2023, Plaintiff filed her Complaint (ECF No. 1), against
12 Defendant.

13 2. Defendant filed its Answer to Plaintiff’s Complaint on July 26, 2023
14 (ECF No. 6).

15 3. The Parties have completed the following discovery to date:

- 16 • The Parties have exchanged initial disclosures.
- 17 • Plaintiff served Defendant with a request for production of documents,
18 request for admissions, and interrogatories on February 9, 2024.
- 19 • Defendant served its responses to Plaintiff’s request for admission on
20 February 24, 2024.
- 21 • Defendant served its responses to Plaintiff’s request for production of
22 documents and interrogatories on March 6, 2024.

23 4. The parties still need to conduct depositions, potentially additional
24 written discovery, serve subpoenas, conduct third-party depositions, and conduct
25 expert discovery.

26 5. The additional time will allow the Parties to conduct extensive and
27 additional fact discovery, including taking depositions, potentially additional written
28 discovery, acquiring all documents from third-parties, resolving pending discovery

1 issues, and additional time to adequately determine whether expert discovery will be
2 needed in this matter.

3 6. No party will be prejudiced by this Court granting this Stipulation as all
4 Parties jointly seek an extension of these deadlines. Moreover, the Parties believe
5 that allowing the extension will serve the ends of judicial economy.

6 7. Moreover, the requested extensions are not sought for the purposes of
7 delay.

8 8. This is the Parties' first request to extend these deadlines.

9 9. Accordingly, the parties request adoption of the following deadlines:

10 **a. Discovery Plan:**

11 Discovery Cut-off **10/28/2024**

12 Deadline to Disclose Expert Disclosures **07/01/2024**

13 Deadline to Disclose Rebuttal Expert Disclosures **07/31/2024**

14 Deadline for Class Certification **07/31/2024**

15 Deadline to File Dispositive Motions **11/27/2024**

16 **b. Pre-Trial Order:** The parties shall file a joint pretrial order no later
17 than **12/27/2024** or thirty (30) days after the date set for filing dispositive motions. In
18 the event that Parties file dispositive motions, the date for filing the joint pretrial
19 order shall be suspended until thirty (30) days after decision on the dispositive motion
20 or further order of the Court.

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WHEREFORE, Plaintiff and Defendant respectfully request this Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling Order to reflect the requested extension.

Dated this 26th day of March 2024.

KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce

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Consortium Corporation d/b/a Hope

Credit LLC

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 3/27/2024

CERTIFICATION OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on March 26, 2024, the foregoing JOINT STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINES was served via CM/ECF to all parties appearing in this case.

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